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Attorney for Defendant JONATHAN CHANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN CHANG and GRACE
CHANG,

Defendants.

Case No. CR 16-0047 EJD

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE STATUS
CONFERENCE**

Defendants Jonathan and Grace Chang, by and through their undersigned counsel, and the United States, by and through Assistant United States Attorney Patrick R. Delahunty, hereby stipulate and agree as follows:

- 1) A status conference in this matter is scheduled for August 27, 2018 at 1:30 p.m.
- 2) As the Court is aware, the parties have been engaged in extensive settlement negotiations. Although the parties continue to work to resolve the case, they agree that it is now in the best interests of the parties and the Court to move the case towards trial. In advance of setting a trial date, however, defendants require additional time to finalize arrangements for trial with counsel and possibly to seek new counsel for one or both defendants.
- 3) According, the parties agree that the matter should be continued to October 22, 2018, at 1:30 p.m., for trial setting.

4) The parties further request that the Court exclude from the time limits of 18 U.S.C. § 3161 the period from August 27 through October 22, 2018. The parties also agree that the ends of justice served by granting such an exclusion of time outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

IT IS SO STIPULATED.

Dated: August 22, 2018

/s/ /

Edward W. Swanson
Mary McNamara
August Gugelmann
SWANSON & McNAMARA LLP
Attorneys for Jonathan Chang

/s/

 Laurel Headley
 Attorney for Grace Chang


/s/

 Patrick R. Delahunty
 Assistant United States Attorney

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The matter is continued to September 24, 2018 at 1:30 p.m. for trial setting. The Court finds that the ends of justice served by excluding the time between August 27 and October 22, 2018 to allow for effective preparation of counsel outweigh the best interests of the public and the defendant in a speedy trial and ORDERS that time is excluded from computation under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B).

Dated: 8/23/2018


Hon. Edward J. Davila
United States District Court